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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MAGGIE THOMSON and JUAN DUARTE,
as representatives of a class of similarly
situated persons, and on behalf of the Caesars
Entertainment Corporation Savings &
Retirement Plan,

Plaintiffs,

v.

RUSSELL INVESTMENTS TRUST
COMPANY, CAESARS HOLDINGS, INC.,
THE PLAN INVESTMENT COMMITTEE,
and THE 401(K) PLAN COMMITTEE.

Defendants.

Case No. 2:21-cv-00961-CDS-BNW

**STIPULATION REGARDING TIME
FOR DEFENDANTS TO ANSWER
PLAINTIFFS' SECOND AMENDED
COMPLAINT**

(Second Request)

1 Pursuant to LR IA 6-1 and 6-2, Defendants Caesars Holdings, Inc., the Plan Investment
2 Committee, and the 401(k) Plan Committee (together, the “Caesars Defendants”); Defendant
3 Russell Investments Trust Company (“RITC”); and Plaintiffs Maggie Thomson and Juan Duarte
4 (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree:

5 WHEREAS, Plaintiffs filed their Second Amended Complaint (ECF No. 50) (“SAC”) on
6 September 20, 2021;

7 WHEREAS, the Parties previously stipulated to a 16-day extension of time for Defendants
8 to answer or otherwise respond to the SAC, *see* ECF No. 48;

9 WHEREAS, Defendants filed their respective Motions to Dismiss the SAC (ECF Nos. 65
10 and 66) on October 20, 2021;

11 WHEREAS, the Parties previously stipulated and the Court ordered that “while
12 Defendants’ motions to dismiss are pending and prior to the time Defendants are required to
13 answer the SAC . . . neither party will be obligated to conduct searches for, collect, or produce any
14 ESI, including email” and “that no written discovery or depositions will take place,” ECF No. 62
15 at 4; ECF No. 63 at 4 (order granting proposed Discovery Plan and Scheduling Order);

16 WHEREAS, the Court entered an order denying RITC’s Motion to Dismiss and granting
17 in part and denying in part the Caesars Defendants’ Motion to Dismiss on March 13, 2023 (ECF
18 No. 109);

19 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(4)(A), the deadline for
20 Defendants to answer the SAC would be March 27, 2023;

21 WHEREAS, the Parties aver that there is good cause to reasonably extend the above
22 deadline in light of the length and complexity of the SAC and defense counsel’s trial in another
23 case;

24 WHEREAS, counsel for the Parties have conferred and agreed to a three-week extension
25 on the deadline for Defendants to answer the SAC;

26 WHEREAS, this is the first request for an extension on the time to respond to the SAC
27 following the Court’s ruling on Defendants’ Motions to Dismiss;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that the deadline for Defendants to respond to the SAC shall be **April 17, 2023**. The Discovery Plan and Scheduling Order's terms regarding the status of discovery pending Defendants' answers, *see* ECF No. 63, shall remain in effect until the filing of such answers.

Dated: March 23, 2023

Respectfully submitted,

LITTLER MENDELSON P.C.

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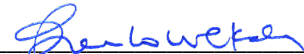
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4 * LR IA 11-2 petition approved

5 *Attorneys for Plaintiffs Maggie Thomson and Juan Duarte*

6
7 **IT IS SO ORDERED.**

8 

9 United States Magistrate Judge

10 DATED: March 27, 2023